

# **EXHIBIT B**

At Part \_\_\_\_\_ of the Supreme Court  
of the State of New York, held in and  
for the County of Tompkins, held in the  
Courthouse, 320 N Tioga St, Ithaca,  
NY 14850, on the \_\_\_\_\_ day of  
\_\_\_\_\_, 2023

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF TOMPKINS

-----  
JOHN DOE,

Plaintiff,

-against-

ITHACA COLLEGE and BRYAN ROBERTS,

Defendants.

**ORDER TO SHOW  
CAUSE FOR LEAVE TO  
FILE A CIVIL ACTION  
USING A PSEUDONYM**

**Index No.:** \_\_\_\_\_

-----X

Upon reading and filing of the Summons and Complaint in this action dated the 20<sup>th</sup> day of November 2023; and the Affirmation of Erin Peake, Esq., sworn to on the 20<sup>th</sup> day of November 2023, it is hereby

ORDERED that defendants show cause as Special Term of this Court to be held at the courthouse located at 320 N Tioga St, Ithaca, NY 14850, on the \_\_\_\_\_ day of \_\_\_\_\_, 2023, at \_\_\_\_\_ o'clock in the forenoon or as soon as counsel may be heard why an Order should not be made and entered as follows:

1. Deeming Plaintiff's use of the pseudonym, "JOHN DOE" and the caption "JOHN DOE, v. ITHACA COLLEGE and BRYAN ROBERTS," to be proper;
2. Permitting Plaintiff to proceed in this action under the pseudonym "JOHN DOE" and with the caption "JOHN DOE, v. ITHACA COLLEGE and BRYAN ROBERTS,"
3. Directing that all parties, their attorneys, and agents refrain from publishing Plaintiff's name and identity; and

4. Directing that all papers filed in this action, and all judgments, orders, decisions, notices to the Court and any other document relating to the action refer to Plaintiff by the pseudonym "JOHN DOE" and bear the caption "JOHN DOE, v. ITHACA COLLEGE and BRYAN ROBERTS," and directing the County Clerk to enter and record all papers in the action under the title "JOHN DOE, v. ITHACA COLLEGE and BRYAN ROBERTS," and

5. Granting such other and further relief as may be just and proper; and it is further  
**ORDERED** that Plaintiff is permitted as interim relief to maintain the above pseudonym caption pending a hearing on this Order to Show Cause; and it is and

**ORDERED** that sufficient cause appearing therefore let service upon all Defendants of a copy of this Order, together with the papers upon which this Order is granted, as well as a copy of the Summons and Complaint, on or before the \_\_\_\_\_ day of \_\_\_\_\_ 2023, be deemed good, timely and sufficient service and notice hereof. An affidavit or other proof of service shall be presented to this Court on the return date directed in the second paragraph of this order.

ENTER:

HON. \_\_\_\_\_ J.S.C.

CI2023-23886

Index #: EF2023-0762

Index No.:

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF TOMPKINS

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JOHN DOE,

Plaintiff,

-against-

ITHACA COLLEGE and BRYAN ROBERTS,

Defendants.

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### ORDER TO SHOW CAUSE

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**BONINA & BONINA, P.C.**

Attorneys for Plaintiff(s)  
32 Court Street, Suite 1700  
Brooklyn, New York 11201  
Tele. No.: (718) 522-1786  
Fax No.: (718) 243-0414

*Pursuant to 22 NYCRR 130-1.1, the undersigned, an attorney admitted to practice in the courts of New York State, certifies that, upon information and belief and reasonable inquiry, the contentions contained in the annexed documents are not frivolous.*

Dated: November 20, 2023

Signature:   
Print Signer's Name: Erin Peake, Esq.

Service of a copy of the within  
Dated:

is hereby admitted.

\_\_\_\_\_  
Attorney(s) for**PLEASE TAKE NOTICE**

that the within is a (certified) true copy of a entered in the office of the clerk of the within named Court on

Notice of  
Entrythat an Order of which the within is a true copy will be presented for settlement to the Hon.  
one of the judges of the within named Court,Notice of  
Settlement

at

on

20 , at

M.

Dated:

To:  
Attorney(s) for**BONINA & BONINA, P.C.**

Attorneys for Plaintiff(s)  
32 COURT STREET  
BROOKLYN, N.Y. 11201